



CDSS

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DEPARTMENT OF SOCIAL SERVICES
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ARNOLD SCHWARZENEGGER
GOVERNOR

May 4, 2009

Ms. Linda Haugan
San Bernardino Human Services System
385 N. Arrowhead Drive, 5th Floor
San Bernardino, CA 92415-0140

Dear Ms. Haugan:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of San Bernardino County. Enclosed is the final report on the review.

There were some compliance issues identified in the report, which will require the development of a corrective action plan. Please submit your plan within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a request since our report is a public document. If you would like us to include a copy of your corrective action plan when responding to these requests, please indicate this when submitting your plan.

If you need technical assistance in the development of your plan, please feel free to contact the Civil Rights Bureau at (916) 654-2107 (voice) / (916) 654-2098 (TDD). You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

RAMÓN S. LOPEZ, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Denise Shefchik, Civil Rights Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
SAN BERNARDINO COUNTY
HUMAN SERVICES SYSTEM
Conducted September 15-17, 2008**

**California Department of Social Services
Human Rights and Community Services Division**

Civil Rights Bureau

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Reviewer

Daniel Cervantes

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the San Bernardino County Human Services System (HSS) with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

Prior to arriving, select public contact employees were interviewed over the phone for general civil rights questioning. An on-site compliance review was conducted on September 15-17, 2008. An exit interview was held with managers and administrative staff on September 17, 2008, to review the findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Rialto DCS	851 W. Foothill Blvd Rialto, CA 92376	CWS	Eng, Span
Hesperia TAD	9655 9 th Ave Hesperia, CA 92345	CalWORKs Cash & Food Stamps	Eng, Span
Fontana ESP/TAD	7977 Sierra Ave Fontana, CA 92335	CalWORKs Cash & Food Stamps	Eng, Span
Ontario TAD	1627 E. Holt Blvd Ontario, CA 91761	CalWORKs Cash & Food Stamps	Eng, Span

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2007-08 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	7	4
Intake Workers	5	2
Children Social Workers	5	2
Receptionist/Screeners	4	3
Total	21	11

An additional 2 interviews were scheduled but were not conducted due to staff unavailability.

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	2
Non-English or limited-English speakers' case files reviewed	59 TAD Cases 16 CWS Cases
Languages of clients' cases	English, Spanish

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Staff make special appointments with clients on an 'as needed' basis. CWS staff work extended hours to accommodate families. TAD staff allow applicants to contact their workers to make appointments at times other than regular business hours.
Does the county have extended hours to accommodate clients?		X		The offices visited did not have additional business hours, but did allow for individual accommodation. Please see answer above.
Can applicants access services when they cannot go to the office?	X			Clients are able to communicate with their workers over the phone. Additionally, workers accommodate clients with home visits.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Aside from the aforementioned accommodations, all services have an 800 number for contact.

				There are also TV commercials, radio announcements, community outreach and the internet that provide awareness and relevant information.
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Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)? Is the pamphlet distributed and explained to each client at intake and re-certification?	X			All staff interviewed were aware of the PUB 13 and explain it to the clients.
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?	X			Every office visited had all required threshold language versions of the PUB 13s displayed in the lobby for the client. Every office was able to provide the rest of the PUB 13s in the available languages if needed.
Was the Pub 13 available in large print, audiocassette and Braille?	X			Every office visited had the required versions of the PUB 13.
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			Every worker interviewed knew who the Civil Rights Coordinator is as well as the location of her contact information.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			In every office visited Spanish was a threshold language. All offices had appropriate signage in Spanish.

B. Corrective Actions

N/A

C. Recommendations

N/A

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: Rialto DCS 851 W. Foothill Blvd

Facility Element	Findings	Corrective Action
Parking	No UNAUTHORIZED PARKING sign at parking lot entrance.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p. 133
Exterior entrance	<p>No ISA sign at building's entrance.</p> <p>Force to open front door excessive at 10 lbs.</p>	<p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195</p> <p>Force to open fire door, minimum allowable not to exceed 15 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(1)) p. 195</p>
Elevator	No bell or voice direction in elevator indicating direction of travel.	A visual and audible signal is provided at each hoist way entrance indicating to the prospective passenger the car answering the call and its direction of travel. (CA T24 1116B.1.14, ADA 4.10.4) pp. 237, 230

Men's restroom: (1 accessible stall)	<p>Soap dispenser too high at 46 inches.</p> <p>Toilet tissue dispenser too high at 50 inches.</p>	<p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p. 269</p> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp 275, 269</p> <p>Toilet paper dispenser minimum height from floor is 19". (ADA 4.16.6) pp. 275, 269</p>
Woman's restroom: (1 accessible stall)	<p>Soap dispenser too high at 46 inches.</p> <p>Toilet protector too high at 50 inches.</p> <p>Toilet tissue dispenser too high at 48 inches.</p>	<p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p. 269</p> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp. 275, 269</p> <p>Toilet paper dispenser minimum height from floor is 19". (ADA 4.16.6) pp. 275, 269</p>

B. Recommendation

N/A

C. Additional comments:

Looking at the front of the building, there are handicap accessible spaces on the left side and right side of the entrance. The building only requires two handicap accessible spaces.

The accessible spaces on the right side (again, facing the building) are in compliance with ADA standards. The spaces to the left force the vehicle's occupant to travel behind their own car AND other vehicles as well. This is unacceptable. Although not required, these additional spaces must meet the ADA standards if they are designated as handicap accessible.

Facility Location: Hesperia TAD 9655 9th Ave

Facility Element	Findings	Corrective Action
Parking	<p>Accessible parking spaces too short at 17 feet.</p> <p>Access aisles (all 4) are missing the words NO PARKING.</p>	<p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135</p> <p>Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p. 135</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p. 135</p>
Exterior entrance	Force to open door excessive at 12 lbs.	<p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195</p> <p>Force to open fire door, minimum allowable not to exceed 15 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(1)) p. 195</p>
Men's restroom	Force to open door excessive at 12 lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195
Woman's restroom	Force to open door excessive at 12 lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195

B. Recommendation

N/A

Facility Location: Fontana TAD 7977 Sierra Ave

Facility Element	Findings	Corrective Action
Parking	No UNAUTHORIZED PARKING sign at entrance.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p. 133
	No van accessible space.	One in every 8 accessible spaces (no fewer than 1) shall be designated van accessible. (CA T24 1129B.4.2, ADA 4.1.2(5)(b)) pp. 135, 136
	Two of the four accessible spaces do not have freestanding/wall handicap accessible mounted signage.	Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p. 133 Wall signage shall be centered 36" minimum above grade, ground, or sidewalk at the interior end of space. (CA T24 1129B.5) p. 133
Exterior entrance	No ISA sign at building's entrance.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24

	Force to open door excessive at 8 lbs.	<p>1117B.5.8.1.2) pp. 183, 353</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195</p> <p>Force to open fire door, minimum allowable not to exceed 15 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(1)) p. 195</p>
Resource Room	<p>No accessible computer in resource room.</p> <p>No signage on resource room door indicating that room is accessible.</p>	<p>Minimum seating knee space is 27" high, 30" wide and 19" deep. (CA T24 1122B.3, ADA 4.32.3) p. 349</p> <p>Where permanent identification is provided for rooms and spaces, signs are installed on the wall adjacent to the latch outside of the door. (CA T24 1117B.5.7, ADA 4.30.6) p. 357</p> <p>Mounting height is 60" above the finished floor to the center of the sign. (CA T24 1117B.5.7, ADA 4.30.6) p. 357</p>
Telephone	Phone in lobby to call worker is too high at 60 inches.	<p>Forward Reach Telephone: highest operable part maximum 48" above the floor. (CA T24 1118B.5, ADA 4.31.3 and 4.2.5) p. 351</p> <p>Side Reach Telephone: the highest operable part shall be 54" maximum above the floor (CA T24 1117B.2.6 & 1118B.6, ADA 4.31.3 & 4.2.6) p. 251</p>

B. Recommendation

N/A

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			All of the receptionists interviewed were well aware of the I SPEAK card and use the card when necessary. Also, there seemed to be an adequate number of bilingual staff in all reception areas visited.
Does the county use a primary language form?		X		The information is taken from the SAWS1 form filled out by the client and input into the C-IV system as required.
Does the client self-declare on this form?		X		See comments above.

Question	Yes	No	Some-times	Comments
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Typically, bilingual workers are assigned to non-English speaking clients. When a bilingual worker cannot be assigned, the use of a language line, other bilingual employees, or other certified interpreters are used to achieve effective communication. Further, forms in English and Spanish are readily available online and in the office in various languages to accommodate the client's needs. Reviewer ONLY audited English and Spanish cases. Other languages were not audited.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			See above
Is there a delay in providing services?		X		Workers are aware of all services available to them to effectively provide services to the client
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			
Are county interpreters determined to be competent?	X			Bilingual workers are certified by the county.

Question	Yes	No	Some-times	Comments
Does the county have adequate interpreter services?	X			San Bernardino County employs many bilingual workers. When a bilingual worker cannot be assigned to a case, English Speaking workers assure that they can communicate with the client effectively.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		
Does the county allow the client to provide his or her own interpreter?	X			Although the county does allow the client to provide their own interpreter, the county's preference is to use their own certified interpreters to achieve effective communication.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			Yes. All workers make sure the client understands the material they receive and they leave satisfied with the communication.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Through all of the (Spanish speaking) case files audited, Spanish forms were given to the client. Forms that were mailed to the client were found to be consistent with the client's primary language selection.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			See comments above

Question	Yes	No	Some-times	Comments
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			Many of the staff interviewed, managers included, were aware of the services offered to both blind and deaf clients.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			Clients who cannot read and/or write are assisted by the worker. Workers at every office do what they can to accommodate client's needs.
Does the county offer screening for learning disabilities?	X			Screening for disabilities is completed by the employment services staff
Is there an established process for offering screening?	X			The offer is made as part of the initial assessment process in employment program

B. Corrective Actions

N/A

C. Recommendation

N/A

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	CalWORKs	Non-Assisted Food Stamps
Ethnic origin documentation	ER Referral and CMS	SAWS1 Application, C-IV	SAWS1 Application, C-IV
Primary language documentation	ER Referral and CMS	SAWS1 Application, C-IV journal	SAWS1 Application, C-IV journal
Method of providing bilingual services and documentation	Services are usually provided by bilingual worker or certified interpreter. Documentation takes place in case narrative.	Services provided by bilingual worker and/or certified interpreter.	Services provided by bilingual worker and/or certified interpreter
Client provided own interpreter	N/A Every case reviewed had a certified county worker present.	C-IV journal	C-IV journal
Method to inform client of potential problem using own interpreter	Verbal	Verbal	Verbal
Release of information to Interpreter	Release of information form	Release of information form	Release of information form
Individual's acceptance or refusal of written material offered in primary language	None documented	C-IV red flag, C-IV journal	C-IV red flag, C-IV journal
Documentation of minor used as interpreter	Mentioned in case narrative N/A for case files reviewed	Minors are NOT used as interpreters	Minors are NOT used as interpreters

Documented Item	Children's Services	CalWORKs	Non-Assisted Food Stamps
Documentation of circumstances for using minor interpreter temporarily	Case narrative	C-IV journal if applicable	C-IV journal if applicable
Translated notice of actions (NOA) contain translated inserts	None present in case files reviewed	In client's designated language if applicable	In client's designated language if applicable
Method of identifying client's disability	Initial interview, client assessment	Initial assessment, C-IV red Flag	Initial assessment, C-IV red Flag
Method of documenting a client's request for auxiliary aids and services	Case comments or case narrative	C-IV journal	C-IV journal

B. Additional Comments and Recommendations

San Bernardino County (SBC) is currently one of four counties that use the C-IV system. Of the four counties, SBC is the only one that uses a flag to differentiate cases that require special accommodation. This is simply a red flag that the user adds to the front page of the case file. This enhancement to the C-IV system indicates to the reviewer and other viewers of the case file that the case requires a special need – whether that need is for a language service or accommodation for a disability. Workers are to place a flag on any case where a client indicates a primary language other than English. All non-English cases displayed the flag in the case file. Similarly, the CWS cases reviewed had either a solid green circle, (in the form of a dot or green sticker) that suggested a special need. Every case reviewed in CWS displayed this green circle.

A second SBC addition to the C-IV system is a standard template filled out by the worker in the case journal. The standard design of this template ensures that the worker provides the required information regarding the delivery of language services (i.e. who served as the interpreter – even if that person was the assigned worker). In almost every case, the template was used. In some instances, the template was modified (questions were deleted) or the questions went unanswered. It should be noted that this occurred in a very small number of cases reviewed. Furthermore, the questions that were either unanswered or deleted did NOT affect the thoroughness of the documentation.

Although no corrective action is necessary, it is recommended that the workers be retrained on the importance of answering every question in the C-IV template. This will provide the accuracy and thoroughness intended by the use of the template.

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?	X			Some of the employees interviewed suggested that they hadn't received "regular" cultural awareness training
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

N/A

C. Recommendation

N/A

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			
Did the employees know who the Civil Rights Coordinator is?	X			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action

N/A

C. Recommendation

N/A

IX. CONCLUSION

San Bernardino County Human Services System (HSS) was found to be in overall compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

It is quite evident that Denise Shefchik, Civil Rights Coordinator, is very involved in the civil rights training of the staff. She has assumed a very proactive role in the civil rights/Division 21 training and developing of the San Bernardino County staff. A special thanks to her and her staff for their accommodations and hard work.

San Bernardino County HSS must remedy the violations identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the violations.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.